

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA,**

**Plaintiff,**

**Civil Action No. 2:18-MC-00048**

**v.**

**Judgment originally entered in the United  
States District Court, Southern District of  
New York, Case No. 1:17-cv-01329-PAC**

**SOUTHERN COAL CORPORATION,**

**Defendant.**

**DEFENDANT SOUTHERN COAL CORPORATION'S NOTICE OF WITHDRAWAL  
AND SUBSTITUTION OF COUNSEL**

Defendant, Southern Coal Corporation, pursuant to Rule 83.4 of the Southern District of West Virginia Local Rules of Civil Procedure, hereby advises the Court and Counsel that John F. Hussell, IV, John D. "Jody" Wooton, Jr., Andrew L. Ellis, and the law firm of Wooton, Davis, Hussell & Ellis, PLLC, will withdraw as counsel for the Defendants and that Christopher D. Pence of the law firm Hardy Pence, PLLC will substitute as counsel for the Defendants.

Pursuant to the provisions of Local Rule 83.4, Undersigned counsel further certify:

- (1) the withdrawal and substitution will not delay the trial or other progress of the case; and
- (2) the notice is filed and served at least 90 days before trial.

**SOUTHERN COAL CORPORATION,**  
*By Counsel*

/s/ John F. Hussell, IV  
John F. Hussell, IV - WV Bar No. 6610

/s/ John D. Wooton, Jr.  
John D. (Jody) Wooton, Jr. – WV Bar No. 10571

/s/ Andrew L. Ellis  
Andrew L. Ellis – WV Bar No. 10618  
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*Counsel for Defendant*